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October 29, 2019

**VIA CM/ECF EFILING**

Hon. Brian R. Martinotti, U.S.D.J.  
Clarkson S. Fisher Building & U.S. Court House  
402 East State Street, Rm. 341  
Trenton, NJ 08608

**RE: GRECO V. GREWAL, ET.AL.  
FEDERAL DOCKET NO.: 3:16-cv-19145-BRM-TJB  
FILE NO.: 4166**

Dear Judge Marinotti:

This office represents David Greco, the plaintiff in the above entitled action. I have had the opportunity to review the request of Brian Lucas, DAG on behalf of defendant Gurbir S. Grewal requesting an adjournment of our November 13, 2019 return date on the Order to Show Cause for the temporary restraints.

So the court is aware I do not have a specific objection to the one week adjournment request with all filing dates advanced by one week. The issue, as the Atty. Gen.'s office is aware, is the concomitant state court matter of **STATE V. GRECO** Petition No. 0415 XTR 2019 000001, in the Camden County Superior Court before the Honorable Edward J. McBride, Jr., P.J.Cr.

Last week the State Court matter was moved to November 21, 2019 which placed the matter one week after the return date of the Order to Show Cause in the Federal matter giving everyone sufficient time to be prepared for that case and Your Honor's anticipated decision whether or not the temporary restraints would be issued. Moving the Federal matter to the afternoon of November 20, 2019 would not give the parties time to be prepared for a November 21<sup>st</sup> court date at 9 AM and most certainly does prejudice my client, David Greco.

I am copying this correspondence to Judge McBride as well as Nevan Soumilas, Assistant Prosecutor from the Camden County prosecutor's office, who is handling the State Court matter, to request an additional adjournment of the November 21, 2019 date or, which I believe would be more appropriate, staying the State Court matter until there is a resolution of the Federal case. The State Court matter should not proceed with the Federal claims pending as these claims which may abrogate the State's case. For the State to proceed forward with the Federal case pending clearly violates Mr. Greco's civil rights and places him at a severe

disadvantage both in the State's case and in the preservation of his constitutional rights which the Federal case is to adjudicate.

My client, David Greco, does not object to the continuance of the TERPO during the pendency of the Federal matter so long as the Camden County Prosecutor's Office and the Gloucester Township Police Department safeguard my client's firearm.

Thank you for your kind considerations in this matter.

Respectfully submitted,

*s/Albert Rescino*

**ALBERT J. RESCINO, ESQ.**

AJR/dk

cc: David Greco via email only  
Hon. Edward J McBride, Jr., P.J.Cr. via e-mail only  
Nevan Soumilas, Esq. via e-mail only  
All Counsel of Record via CM/ECF E-FILE